

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Cr. No. 17-20787

v.

District Judge Linda V. Parker

JEROME WILSON,

Defendant.

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**SUPPLEMENTAL BRIEF:
UPDATE ON FAMILY CIRCUMSTANCES**

When counsel last updated the Court, Jerome Wilson’s grandson, Jacobie Wilson, had been shot and killed. (R. 37.) Sadly, the family continues to endure tragedy. Two weeks ago, Wilson’s father, with whom he plans to live if released, had his leg amputated because of blood problems that led to an infection. Jerome Wilson’s sister, Dianne Robinson, is helping take care of her father, but she works a full-time job at Chase Bank as a customer-service representative. If Jerome is released, he will be able to care for his father, who is currently wheelchair bound.

Counsel spoke with multiple family members, including Ms. Robinson, who all expressed support for Jerome and indicated that he would be a major help to the family if released. The need for Jerome to care for his ailing father, in addition to the concession by the government that his health condition presents an “extraordinary

and compelling” reason for release under 18 U.S.C. § 3582(c)(1)(A)(i), further weighs in favor of release.

Respectfully submitted,

s/Benton C. Martin

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Dated: September 7, 2020

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CERTIFICATE OF SERVICE

I certify that on September 7, 2020, I filed the foregoing paper with the through the court's electronic docketing system, which will send notification to opposing counsel of record.

/s/Benton C. Martin